



Mars Khaimov Law, PLLC

MEMO ENDORSED

VIA ECF

Honorable Judge Valerie Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

108-26 64th Avenue, Second Floor

Forest Hills, NY 11375

Tel.: 929.324.0717

Fax: 929.333.7774

E-mail: mars@khaimovlaw.com

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September 19, 2023

Re: *1:23-cv-4341 Brown v. Go To Gifts Inc.*

Status Letter and Request for Adjournment of Conference

Dear Judge Caproni:

Plaintiff's counsel submits this letter-motion to seek an adjournment of the initial case management conference and associated submission deadlines. The conference is currently scheduled for September 22, 2023 and the pretrial documents are past due. Plaintiff has not yet been in communication with the Defendant, and will seek a default judgment if they do not appear by the next conference date. As such, Plaintiff proposes a 60-day adjournment and a new date of November 17th, 2023, or a date more convenient to the Court. This is the first time this relief is being requested.

We thank the Court for its attention and consideration in this matter.

The initial pretrial conference is ADJOURNED *sine die*. Defendant's deadline to answer or otherwise respond to the Complaint is **September 22, 2023**. Dkt. 5. If Defendant does not timely answer or respond, Plaintiff's motion for an order to show cause why default judgment should not be entered in accordance with the Undersigned's Individual Practices is due **September 26, 2023**.

Mr. Khaimov's request for an adjournment of the initial pretrial conference and an extension of the deadline to file the pre-conference submissions was filed five days past the due date for pre-conference submissions. Mr. Khaimov has already been admonished and sanctioned for failing to comply with the Court's orders; if he continues to flout the Court's orders and deadlines, he will be sanctioned again.

SO ORDERED.

09/19/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Mars Khaimov

Mars Khaimov, Esq.

Attorney for Plaintiff

